



DOCKET FILE COPY

1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
Telephone: (202) 828-7453

DOCKET FILE COPY ORIGINAL

Jay C. Keithley
Vice President
Law and External Affairs
United Telephone Companies

March 22, 1993

RECEIVED

MAR 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

RE: In the Matter of Elimination or Revision of Certain Reporting Requirements Under Part 43 of the Commission's Rules, Reports of Communications Common Carriers and Certain Affiliates, CC Docket No. 93-5

Dear Ms. Searcy:

Attached are the original and five copies of the Comments of the United and Central Telephone Companies in the proceeding referenced above.

Sincerely,

Jay C. Keithley

Attachment

JCK/mlm

Number of Copies rec'd
1,000 E

045

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAR 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

)
Elimination or Revision of)
Certain Reporting Require-)
ments Under Part 43 of the)
Commission's Rules, Reports)
of Communications Common)
Carriers and Certain)
Affiliates)

CC Docket No. 93-5

**COMMENTS OF THE UNITED AND CENTRAL
TELEPHONE COMPANIES**

The United and Central Telephone companies¹ ("United/
Central") respectfully submit these comments in response to the
Notice of Proposed Rulemaking, FCC 93-18, released February 2,
1993 ("NPRM") in the above referenced proceeding. The Commission
proposes in the NPRM to eliminate Section 43.42 of its Rules and
to amend Section 43.21(c) by raising the reporting limit to

1. Carolina Telephone and Telegraph Co., United Telephone -
Southeast, Inc., United Telephone Company of the Carolinas,
United Telephone Company of Southcentral Kansas, United Telephone
Company of Eastern Kansas, United Telephone Company of Kansas,
United Telephone Company of Minnesota, United Telephone Company
of Missouri, United Telephone Company of Texas, Inc., United
Telephone Company of the West, United Telephone Company of
Florida, The United Telephone Company of Pennsylvania, United
Telephone Company of New Jersey, Inc., United Telephone Company
of the Northwest, United Telephone Company of Ohio; United Tele-
phone Company of Indiana, Inc., Central Telephone Company,
Central Telephone Company of Florida, Central Telephone Company
of Illinois, Central Telephone Company of Virginia, and Central

companies controlling dominant carriers with over \$100 million in revenues.²

The deletion of Section 43.42 would remove the obligation of certain common carriers to file detailed reports dealing with pension and benefit plans. The Commission notes that since Section 43.42 was originally adopted Congress has passed the Employment Retirement Income Securities Act ("ERISA") which has established standards for the conduct of pension and welfare benefit plans.³ In addition, the Financial Accounting Standards Board ("FASB") has adopted accounting standards that provide guidance on pension accounting.⁴

United/Central believes that the ERISA and FASB changes provide enough control over pension and benefit plans and accounting that the Commission may safely rely on USOA Report 43-02 Table VIII and, as appropriate, data requests to provide pension and benefit oversight. Thus, United/Central supports the deletion of Section 43.42.

2. NPRM at ¶1.

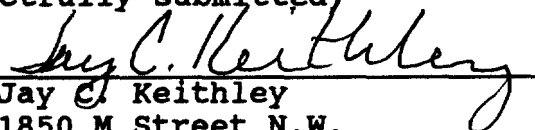
3. Id. at ¶¶5-7.

4. Id. at ¶8.

Further, while changes in Section 43.21(c) will not affect the company controlling United/Central, changes that remove regulatory expenses are welcomed. United/Central support the proposal to modify Section 43.21(c) so that the burden on smaller companies may be reduced.

Respectfully submitted,

By:


Jay C. Keithley
1850 M Street N.W.
Suite 1100
Washington, D.C. 20036
(202) 857-1030

W. Richard Morris
P. O. Box 11315
Kansas City, MO 64112
(913) 624-3096

Attorneys for
United Telephone Companies
Central Telephone Companies

March 22, 1993

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 22nd day of March, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of the United and Central Telephone Companies" in CC Docket No. 93-5, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.

ITS
1919 M Street, N.W.
Room 246
Washington, D.C. 20554


Melinda L. Mills